

1 **BLANK ROME LLP**

2 Todd M. Malynn (SBN 181595)

3 [todd.malynn@blankrome.com](mailto:todd.malynn@blankrome.com)

4 Arash Beral (SBN 245219)

5 [arash.beral@blankrome.com](mailto:arash.beral@blankrome.com)

6 Todd M. Malynn (SBN 181595)

7 [jamison.gilmore@blankrome.com](mailto:jamison.gilmore@blankrome.com)

8 2029 Century Park East | 6<sup>th</sup> Floor

9 Los Angeles, CA 90067

10 Telephone: 424.239.3400

11 Facsimile: 424.239.3434

12 Attorneys for Defendants, Counterclaimants, and  
13 Third Party Plaintiffs PCJV USA, LLC, PCI  
14 TRADING LLC, POTATO CORNER LA  
15 GROUP, LLC, GK CAPITAL GROUP, LLC,  
16 NKM CAPITAL GROUP, LLC and GUY  
17 KOREN, and Defendants J & K AMERICANA,  
18 LLC, J&K LAKEWOOD, LLC, J&K  
19 OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
20 & K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
21 HLK MILPITAS, LLC, and GK CERRITOS, LLC

12 **UNITED STATES DISTRICT COURT**  
13  
**CENTRAL DISTRICT OF CALIFORNIA**

15 SHAKEY'S PIZZA ASIA VENTURES,  
16 INC, a Philippines corporation,

17 Plaintiff,

18 vs.

19 PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING , LLC, a  
20 Delaware limited liability company; GUY  
21 KOREN, an individual; POTATO CORNER  
22 LA GROUP, LLC, a California limited  
liability company; NKM CAPITAL GROUP,  
23 LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
24 limited liability company; J&K  
25 LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
26 LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
27 California, limited liability company; GK  
28 CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,  
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**DECLARATION OF TODD  
LANDER**

Complaint Filed: May 31, 2024

Trial Date: August 18, 2025

1 limited liability company and DOES 1  
2 through 100, inclusive,

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4 Defendants.

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6 PCJV USA, LLC, a Delaware limited  
7 liability company; PCI TRADING LLC, a  
8 Delaware limited liability company;  
9 POTATO CORNER LA GROUP LLC, a  
10 California limited liability company; GK  
11 CAPITAL GROUP, LLC, a California  
12 limited liability company; NKM CAPITAL  
13 GROUP LLC, a California limited liability  
14 company; and GUY KOREN, an individual,

15 Counter-Claimants,

16 v.

17 SHAKEY'S PIZZA ASIA VENTURES,  
18 INC, a Philippines corporation,

19 Counter Defendant.

20  
21 PCJV USA, LLC, a Delaware limited  
22 liability company; PCI TRADING LLC, a  
23 Delaware limited liability company;  
24 POTATO CORNER LA GROUP LLC, a  
25 California limited liability company; GK  
26 CAPITAL GROUP, LLC, a California  
27 limited liability company; NKM CAPITAL  
28 GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

29 Third Party Plaintiffs,

30 v.

31 PC INTERNATIONAL PTE LTD., a  
32 Singapore business entity; SPAVI  
33 INTERNATIONAL USA, INC., a California  
34 corporation; CINCO CORPORATION, a  
35 Philippines corporation; and ROES 1 through  
36 10, inclusive,

37 Third Party Defendants.

## **DECLARATION OF STEPHEN CAINE**

I, Todd M. Lander, declare:

1. I am an attorney at law, duly admitted to practice before this Court and all courts of the State of California, and I am a partner with Ellis George LLP. I have firsthand, personal knowledge of the facts set forth below and if called as a witness could competently testify to them under oath.

2. Arash Beral is my former partner at Freeman, Freeman & Smiley LLP, and I have known and worked with him for over a decade. And we worked very closely together for almost the entirety of that time. Among other matters, I was involved in this lawsuit in its early stages, and appeared with Mr. Beral at some of the early hearings – including a preliminary injunction hearing in the Los Angeles Superior Court.

3. I was, in that capacity, a participant in and privy to early communications with opposing counsel, including lawyers at DLA Piper. Mr. Beral was taking the lead on many of those communications, and concerning much of the litigation. I recall that the two sides had significant conflicts concerning various aspects of the case, and that many of the early procedural issues – including the preliminary injunction application mentioned above – were highly contentious, in the sense that they involved substantive issues over which the parties strongly disagreed. But I also recall that Mr. Beral maintained a courteous and professional relationship with opposing counsel, and took all steps necessary to ensure these disputes were litigated in a civil and appropriate manner.

4. More generally, I have always known Mr. Beral to conduct himself in fidelity to the highest standards of ethics and professionalism. I cannot recall a single occasion where I observed Mr. Beral act in an unprofessional or unethical manner. That is entirely contrary to my experience.

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1 I declare under penalty of perjury that the foregoing is true and correct.  
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3 Executed this 6<sup>th</sup> day of August, 2025, at Los Angeles, CA.  
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6 By: /s/ Todd M. Lander  
7 Todd M. Lander  
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## **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 6, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on August 6, 2025.

By: /s/AJ Cruickshank